

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FOUR WOMEN HEALTH SERVICES,  
LLC.

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY  
RESOURCE CENTER INC. d/b/a  
ATTLEBORO WOMEN’S HEALTH CEN-  
TER, CATHERINE ROMAN, NICOLE  
CARGES, DARLENE HOWARD, and  
CHOOSE LIFE MARKETING, LLC,

Defendants.

Case No. 1:24-cv-12283-JEK

**DEFENDANT CHOOSE LIFE MARKETING, LLC’S UNOPPOSED MOTION FOR  
LEAVE TO FILE REPLY IN SUPPORT OF ITS MOTION TO DISMISS**

Pursuant to Local Rule 7.1(b)(3), Defendant Choose Life Marketing, LLC (“Choose Life”) respectfully requests leave to file a reply brief in support of its Motion to Dismiss (Dkt. 64). A copy of the proposed reply brief is attached hereto as Exhibit A.

Choose Life respectfully contends that the proposed reply brief will assist the Court in resolving Choose Life’s Motion to Dismiss, clarifying the issues between the parties, along with preserving valuable Court time at the parties’ oral argument on July 29, 2025 (Dkt. 83). Choose Life’s Motion to Dismiss (Dkt. 64) and Plaintiff’s Opposition (Dkt. 81) implicate significant First Amendment interests, along with numerous issues of state and federal statutory law.

On May 29, 2025, the parties conferred regarding Choose Life’s Motion for Leave to File a Reply Brief. Plaintiff’s counsel indicated that Plaintiff does not oppose this motion.

Accordingly, Defendant respectfully requests leave to file the attached reply brief.

Respectfully submitted this 2nd day of June, 2025.

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/s/ Nathan Loyd

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2025, I served a copy of the foregoing document upon the following counsel of record via CM/ECF:

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Dated: June 2, 2025

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